

No Place Like Home Program (NPLH)

AB 1618



California Department of Housing and Community Development

January 2017



Agenda

1. Program Context and Goals
2. Program Components and Timeline
3. Technical Assistance Funds
4. Definitions and General Conditions of Funding
5. Non-Competitive Allocations
6. Competitive Program Formula Allocation

15-Minute Break

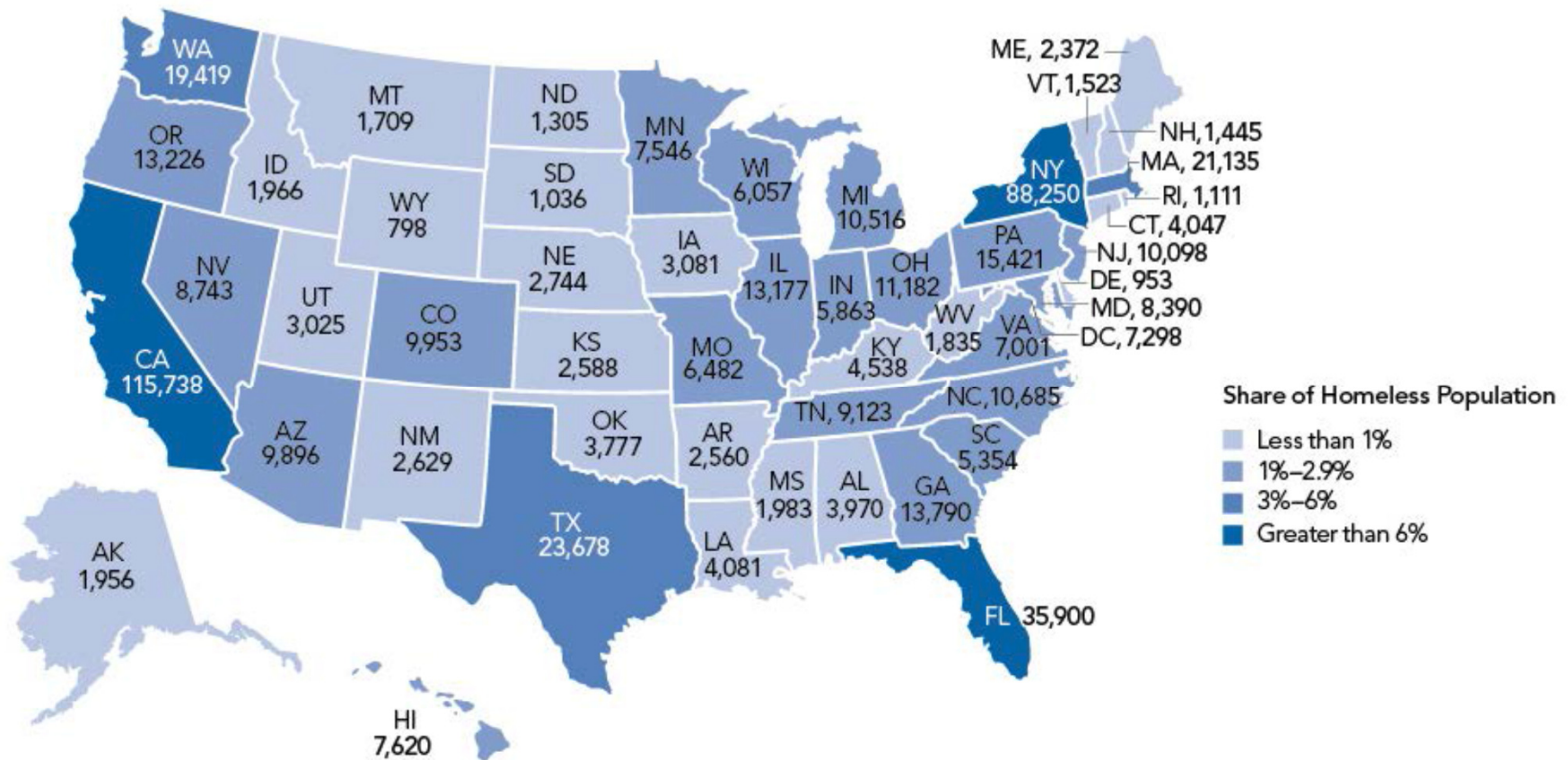
7. Competitive Program Threshold and Rating Criteria
8. Capitalized Operating Subsidy Reserves
9. Supportive Services Plan and Requirements
10. Outcome Measures
11. Alternative Program (LA, San Diego, SF, Santa Clara)

Program Context and Goals





California has the Highest Percentage of People Experiencing Homelessness in the Nation

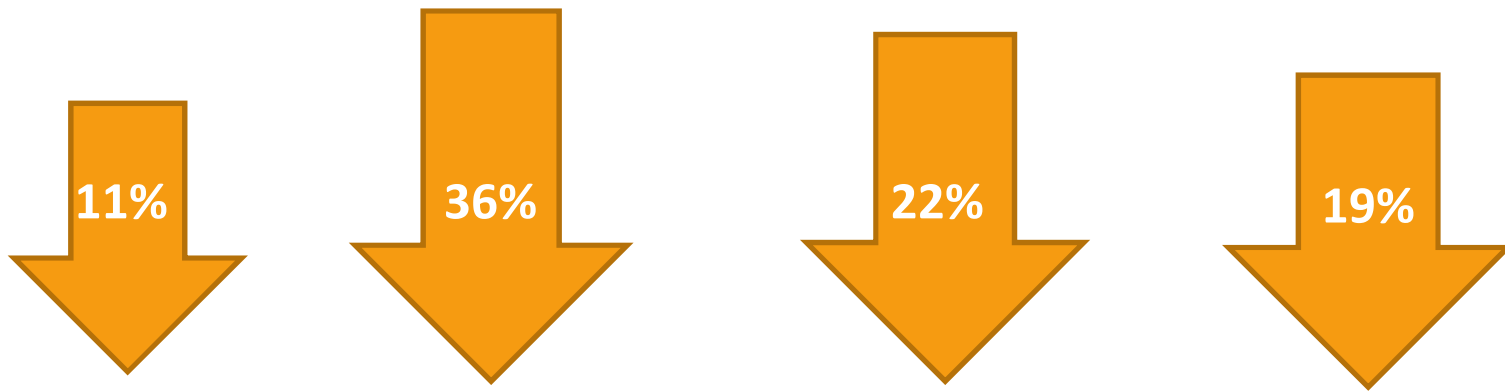
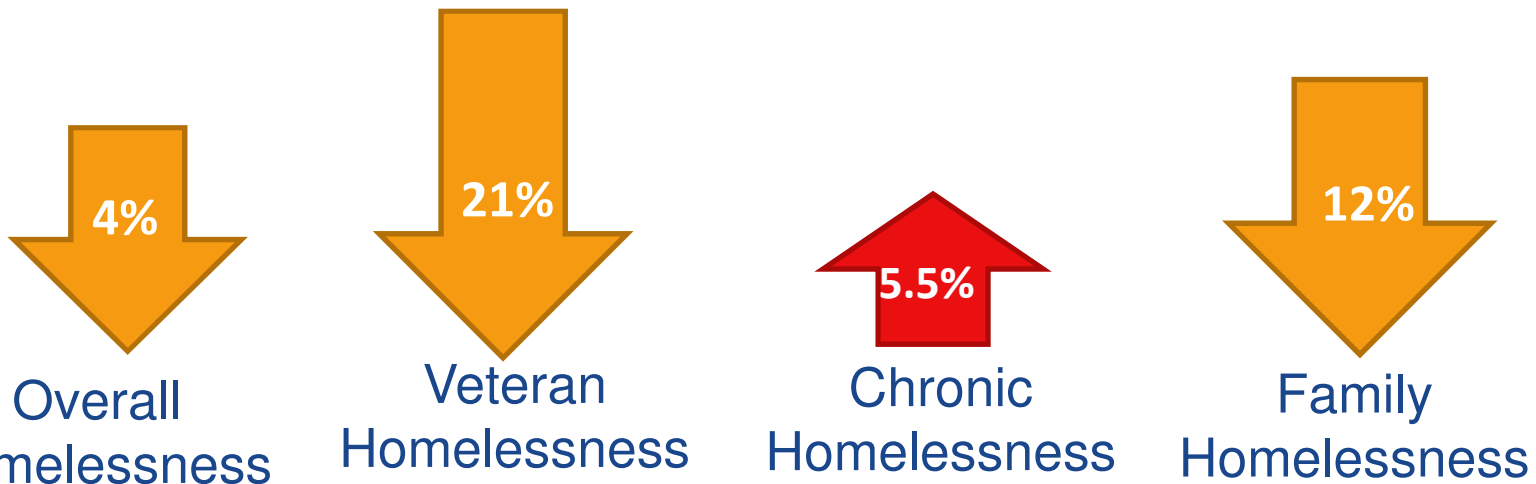


Source: 2015 AHAR: Part 1 - PIT Estimates of Homelessness in the U.S



California Lags Behind the Rest of the Nation in Combating Homelessness

California



United States

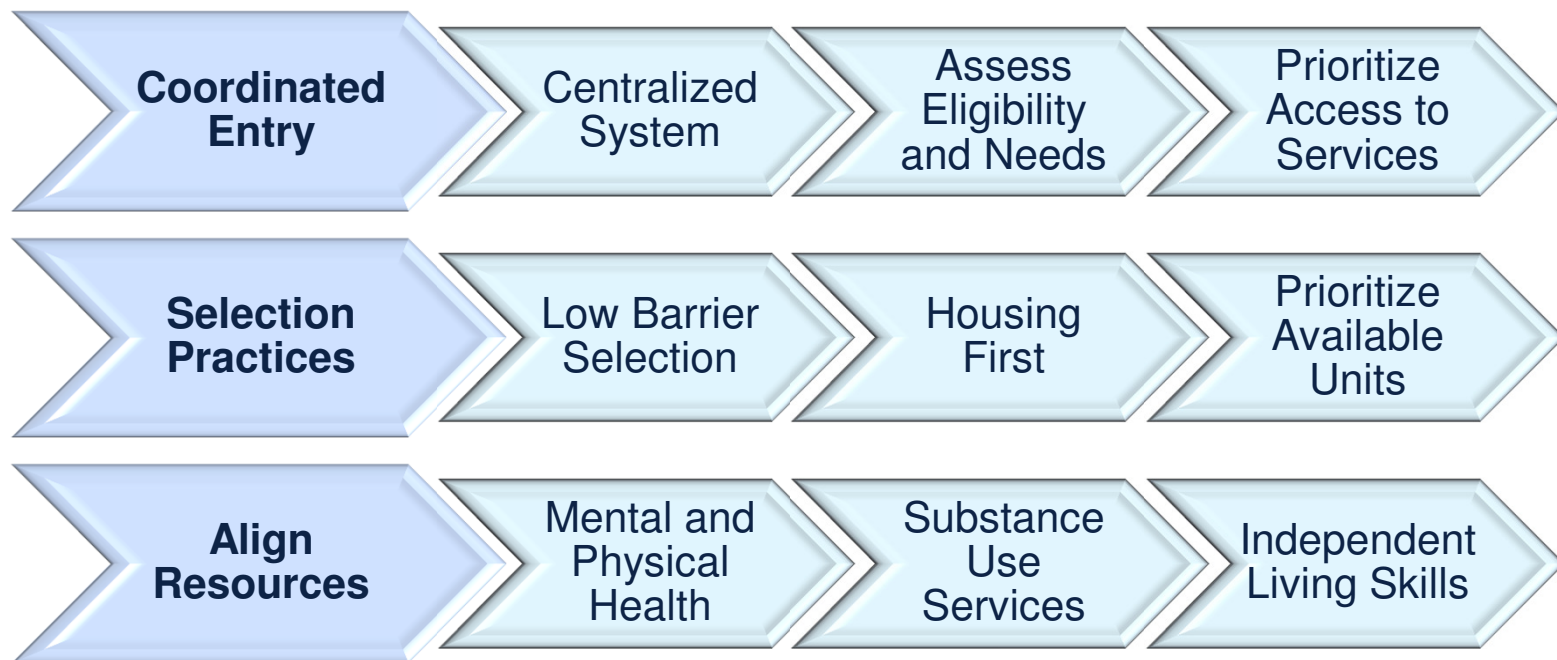


NPLH Program Goals

- Permanent Supportive Housing
- Housing First
- Flexible, Voluntary, and Individualized Services
- Innovation in Program Services and Delivery
- Continuity of Care
- Housing Projects in Proximity to Community Services



NPLH Program Goals: Program Services and Delivery

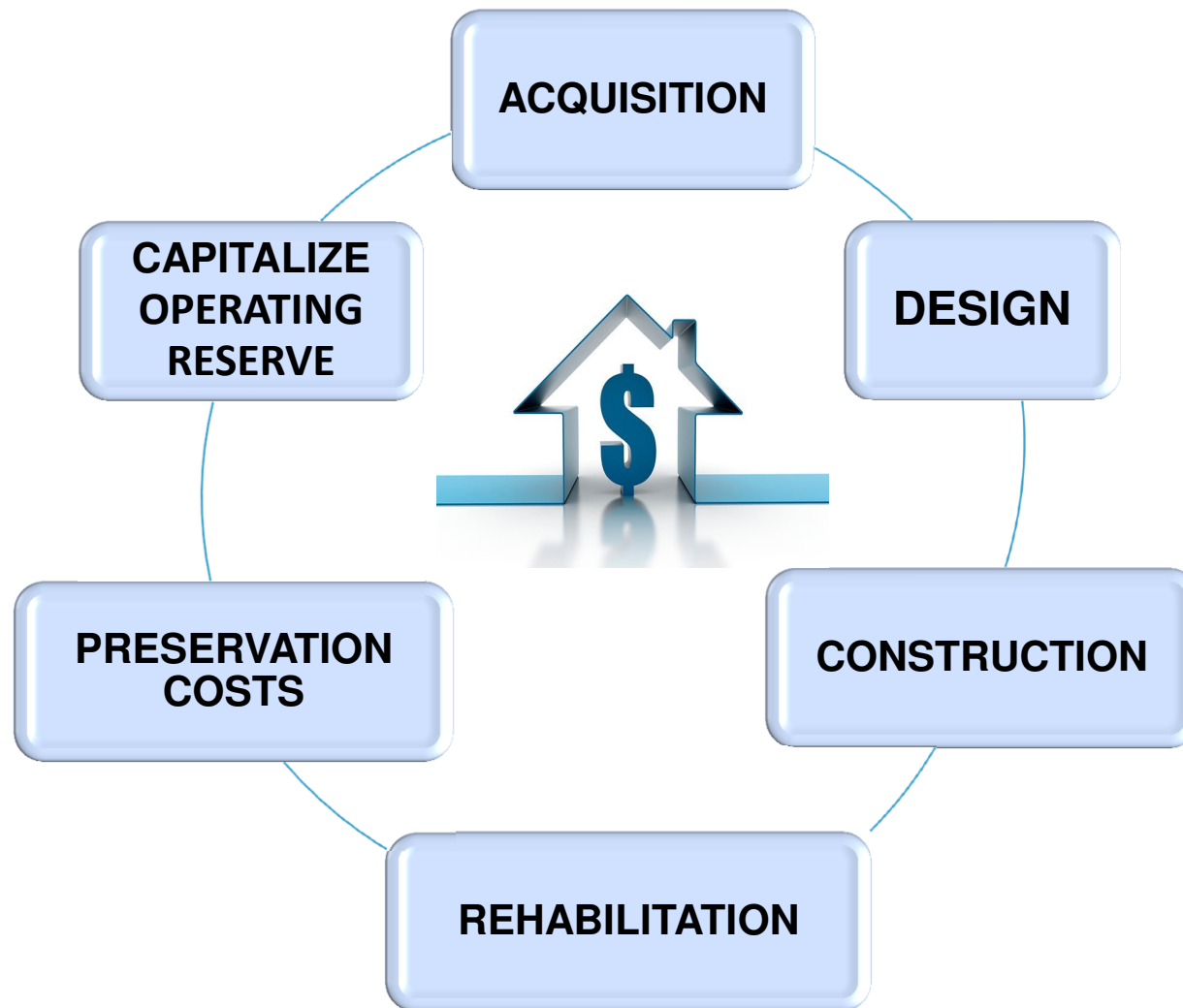


Program Components and Timeline





NPLH Program Eligible Uses:





Program Components and Timeline

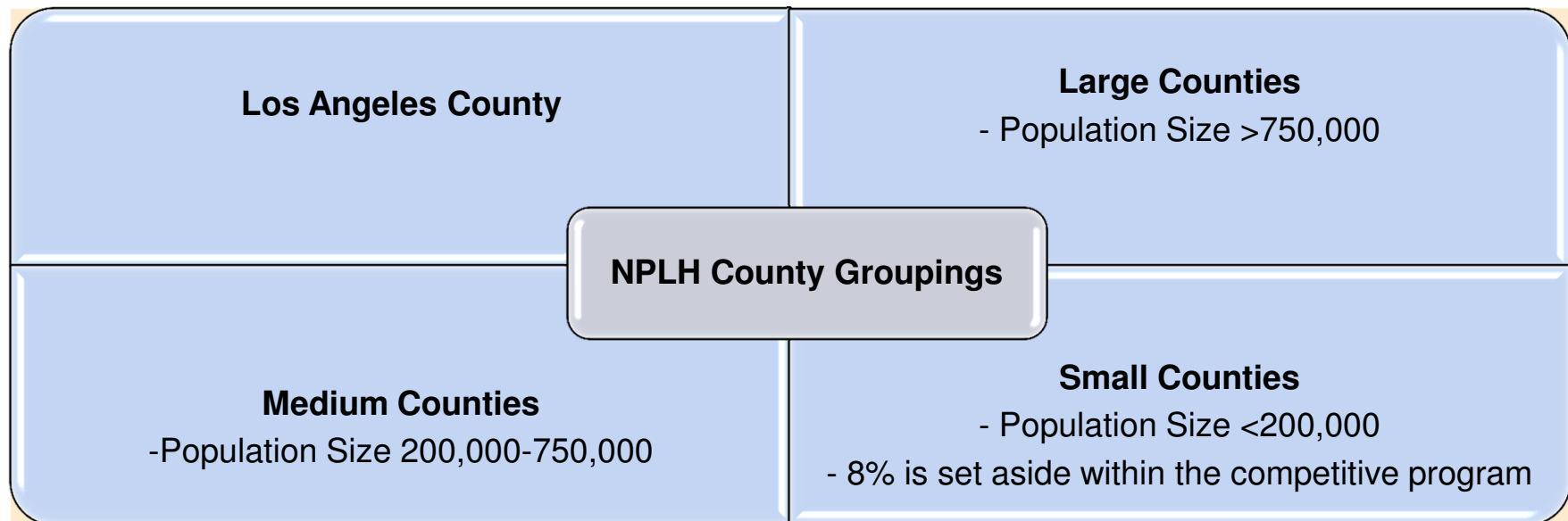
How much:	\$2 billion <ul style="list-style-type: none">• \$1.8 billion Competitive/Alternative Program• \$200 million Non-Competitive / Over-the-Counter
Who can apply:	Counties (alone or in partnership with Developers)
Target Populations:	<ul style="list-style-type: none">• Chronically Homeless• At-risk of Chronic Homelessness• Homeless• All persons must have a serious mental illness



Program Components Overview and Timeline

Competitive Program:

- Up to \$1.8 billion
- Allocated to regions of counties based on population-size
- Formula-based allocations





Program Components Overview and Timeline

Alternative Program:

- Counties with 5% or more of the State's homeless population may administer their own funds with the Department's approval.
- As of 2016: Los Angeles, San Diego, San Francisco, and Santa Clara.
- Counties participating in the Alternative Program will be responsible for project selection, underwriting, and long-term monitoring.



Program Components Overview and Timeline

Non-Competitive / Over-the-Counter Funds:

- Up to \$200 million available to all counties
- Allocation formula is based on HUD Point in Time Count Data
- Minimum allocation of \$500,000
- Funds available continuously for first eighteen (18) months

Technical Assistance:

- \$6.2 million
- Grants to counties based on population size



Anticipated Timeline

Initial Research, Stakeholder Outreach, Advisory Committee Recruitment	Fall 2016
Release of Framework Paper and Start of Public Comment Period	Winter 2016
Advisory Committee Meetings Begin	Winter 2017
Development of Guidelines	Spring 2017
Completion of Guidelines and Notice of Funding Availability	Summer 2017
Release of Notice of Funding Availability	Winter 2018*

**Subject to completion of the validation process*

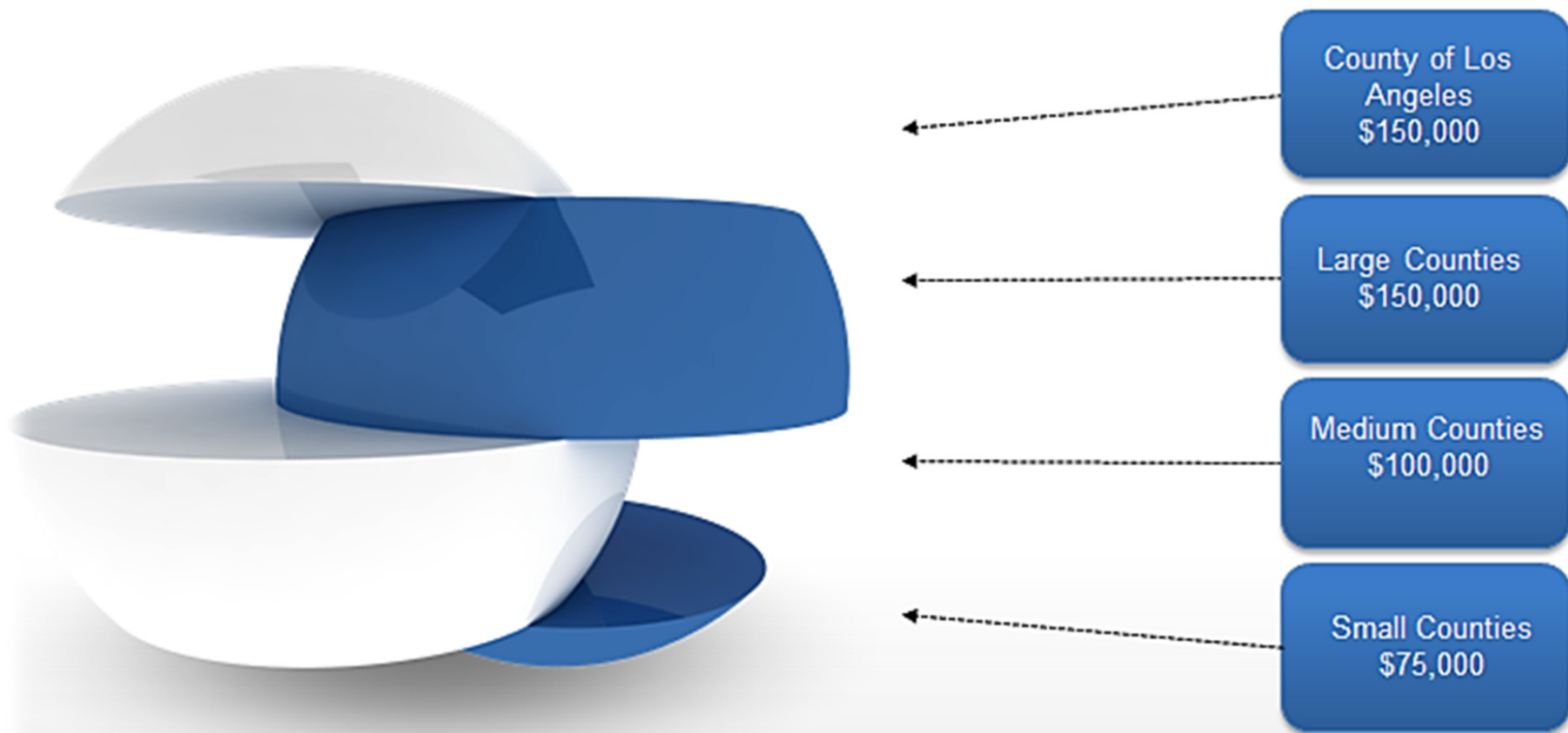
Technical Assistance Funds





Technical Assistance (TA)

Allocating \$6.2 million, the Department shall provide TA funds in the form of a grant to counties as follows:





Technical Assistance

Eligible Use of TA:

- Applying for NPLH program funds
- Implementing NPLH activities
- Coordinating with local homelessness systems
- Delivering a range of supportive services to tenants
- Data collecting, sharing data amongst multiple systems, evaluating program activities
- Meeting other NPLH program related requirements



Technical Assistance

- Promoting evidence-based service delivery
- Hiring staff or consultants
- Coordinating and partnering with service providers
- Coordinating, communicating, and collaborating with the Department, and other state agencies
- Developing or updating the county homeless plan



Technical Assistance

Unspent Allocation

- If a county does not expend the allocated funds by June 30, 2020, funds shall revert back to the Department.

Remaining Funds:

- The Department may use the remaining \$450,000 and any other unawarded or unspent TA funds to contract for other technical assistance.



Technical Assistance through the Department

TA provided through the Department's TA funds may include:

- Creating or enhancing developer capacity
- Assessment of Technical Assistance and training needs
- Providing cross-training opportunities between housing, behavioral health, and other county provider agencies.
- Funding programs that support the creation and operation of housing for Target Population.



Technical Assistance through the Department

- Understanding the unique procedures and protocols
- Assistance for creating Continuums of Care or to create or strengthens Coordinated Entry System.
- Training and capacity-building
- Potential linkage of the Continuums of Care Homeless Management Information Systems to the Coordinated Entry System.
- Coordinating NPLH funding with other local, federal and state funding sources.



Proposed TA Timeline

TA NOFA Release	January / February 2017
Application Accepted (rolling deadline)	February – June 2017
Award Letters (as applications are received)	February – August 2017



Key Questions

1. Are there any other TA activities the Department should consider funding?
2. Are any of the proposed activities funded by other sources and should not be funded through NPLH TA?

Definitions





Definitions

Three Target Populations

- Chronically Homeless (HUD Definition at 24 CFR 578.3)
- Homeless (HUD Definition at 24 CFR 578.3)
- At-Risk of Chronic Homelessness (NPLH Definition)
- All target populations must be adults living with a diagnosed Serious Mental Disorder or children or adolescents with a Serious Emotional Disturbance as defined under MHSA (WIC Section 5600.3).



At Risk of Chronic Homelessness ***Unique to NPLH***

Persons who are at high risk of long-term or intermittent homelessness, including:

- Persons with a serious mental illness exiting an institutionalized setting, including but not limited to jail or mental health facilities, and who were homeless prior to admission;
- Transition age youth experiencing homelessness or with significant barriers to housing stability, and
- Others, as defined in NPLH guidelines.



Key Questions

1. What, if any, populations should be included in “others” when taking into consideration the goal of prioritizing those with the greatest vulnerabilities experiencing homelessness in California?
2. How should the Department define ‘significant barriers to housing stability’ for transition age youth?
3. What other criteria need clarification in this definition?

Overview of General Loan Terms





Overview of General Loan Terms: Development Funding

- Projects of 5+ units: underwriting, loan servicing and monitoring by the Department (exceptions discussed later).
- Subject to Department's Uniform Multi-Family Regulations
- 55 year affordability period
- For projects of 5+ units, residual receipt permanent financing loans held by project ownership entity; 0.42% interest paid annually from the project to cover the Department's long term monitoring costs.
- Per-Unit loan limits based on affordability restriction levels, geographic location, unit size, and whether the project is accessing four or nine percent tax credits (or no tax credits).

County Non-Competitive Allocations





Non-Competitive Allocations: Over-the-Counter Funding

Funding Term and Amounts:

- Up to \$200 million Over-the-Counter Funding
- Allocation amounts are available continuously for 18 months
- Funds to finance construction, rehabilitation, or preservation of housing with capitalization of operating reserves.

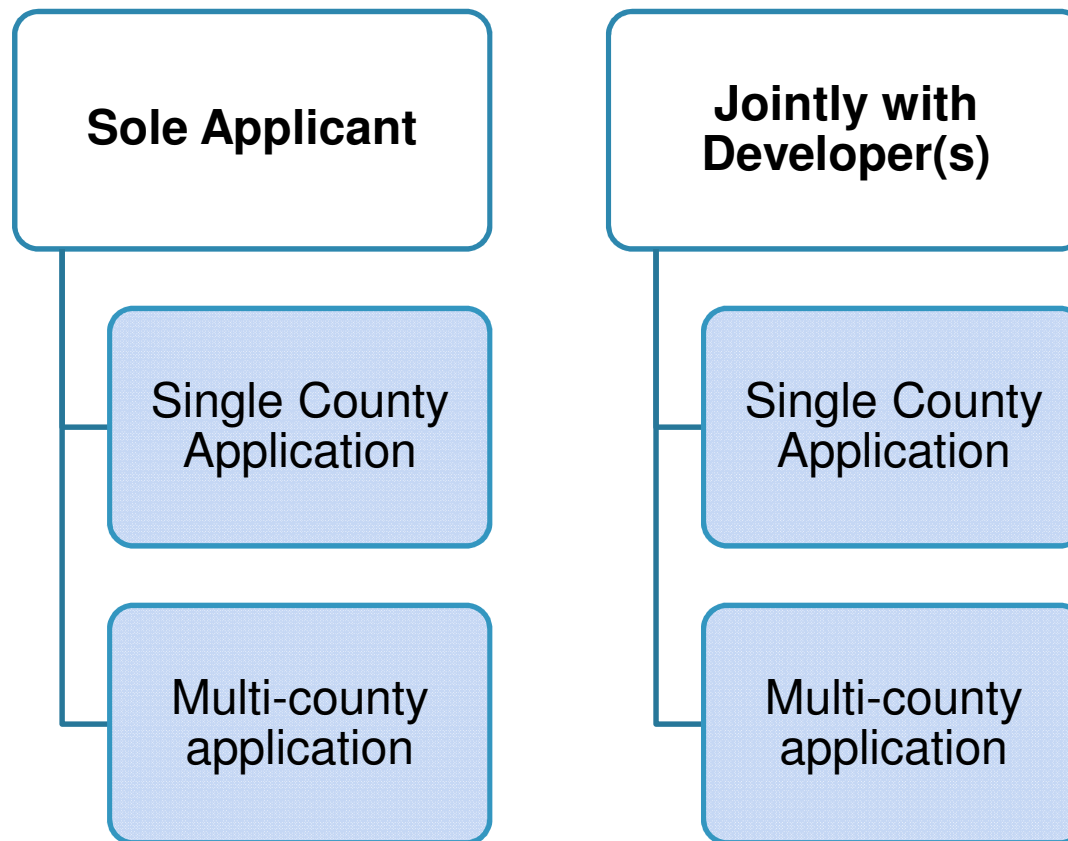
Distribution:

- Department will issue a NOFA for the Over-The-Counter and initial Competitive funding concurrently.
- Funding allocation is based on the Point In Time count in proportion to the total statewide or \$500K whichever is greater. (See Appendix C in the NPLH Framing Paper for estimated amounts).
- All funded projects under the Over-The-Counter must meet the same threshold requirements as the Competitive Program (discussed later).



Non-Competitive Allocations: Over the Counter (OTC) Eligibility

County Application Submissions





Non-Competitive Allocations: Over the Counter (OTC) Threshold

Projects with 5+ NPLH units:

- Common ownership, financing, and property management
- Each household signs a lease
- The Department will administer, underwrite and service these projects
- Receive points in the competitive program if couple the OTC funds with projects submitted under the competitive allocation
- Counties with \$500K formula allocation are encouraged to submit projects with 5+ units. HCD to administer, underwrite and service these projects.



Non-Competitive Allocations: Over the Counter (OTC) Threshold

Projects with 1 - 4 NPLH units

- Available to counties with \$500K formula allocations
- Acquisition with or without rehabilitation activity with a 20-year affordability period
- Counties may use up to 10% for administrative costs
- The county will administer, underwrite, and ensure the following:
 - a. Financial feasibility
 - b. 20-year viability period
 - c. Income, target population, rent restrictions, and local habitability standards are met
 - d. County enters into a regulatory agreement with project owner
 - e. Supportive services are provided
 - f. Oversight of any rehab work and ongoing project monitoring for compliance
- All funds will be provided once property has been acquired/ rehabilitated



Key Questions

1. What are some of the unique challenges associated with developing shared housing?
2. Under what circumstances will group home licensing requirements be triggered by shared housing?

Competitive Program Formula Allocation





Competitive Program Formula Allocation

- Statute requires HCD award \$1.8 billion through a competitive process.
- Competitive pools are established according to county population size.
- Amount available to each pool is based on formula that by statute must include the number of homeless persons residing within each county.
- Other formula factors that support the overall objectives of the NPLH program may be considered.



Competitive Program Formula Allocation

Formula Allocation Goals and Objectives

- **Target Population:**
 - Does the formula allocate funds to counties with the most demonstrated need?
- **Accessibility:**
 - Is the data readily available and can it be replicated for all counties?
- **Transparency:**
 - Is the formula easy to understand?



Competitive Program Formula Allocation: Proposed Formula and Default Reserves

Allocate funds based on two formula factors:

- Point-in-Time Count (PIT) - *weighted at 70%* and published by HUD.
- Extremely Low Income (ELI) Renter Cost Burden - *weighted at 30% from HUD's Comprehensive Housing Affordability Strategy dataset.*

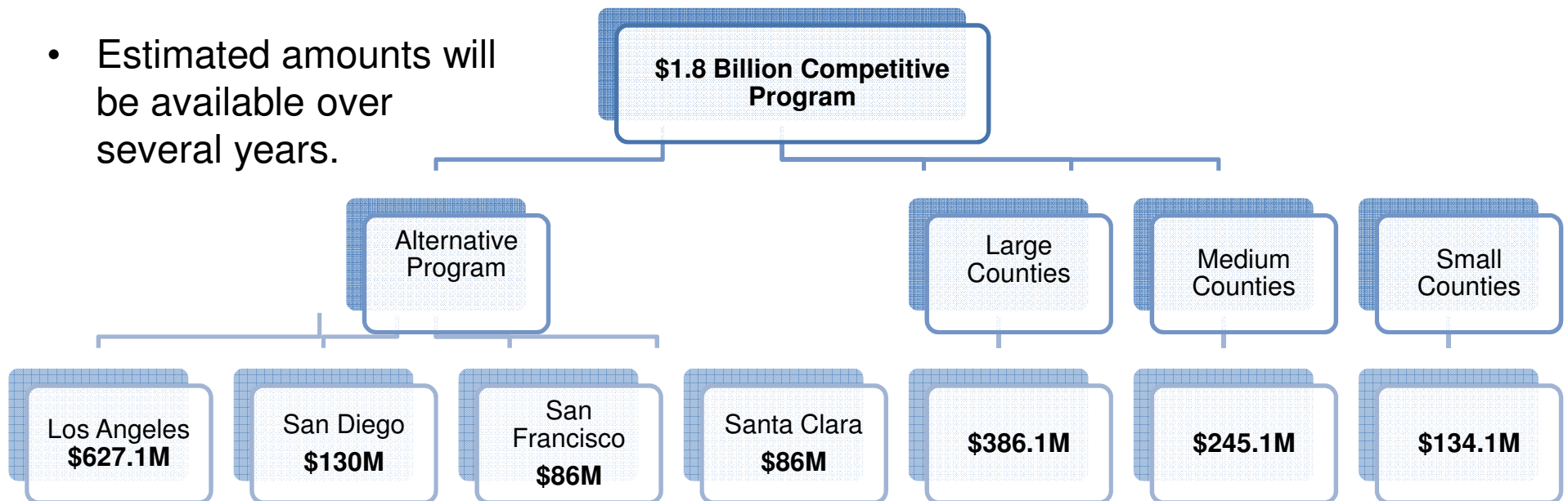
Small County Set aside:

- Counties with <200K in population
- Each funding round will make a minimum of 8% of funds available, or more when considering Small County need under the proposed formula.



Competitive Program Formula Allocation: With Alternative Program

- Allocations reflect deductions for \$90M State admin and \$15.6M for default reserves.
- Estimated amounts will be available over several years.





Competitive Allocation: No Alternative Process Participation

\$1.8 Billion Competitive Program

- Allocations reflect deductions for \$90M State admin and \$34.2M for default reserves.
- Estimated amounts will be available over several years.

Los Angeles
County

\$614.1M

Large Counties

includes San Diego, San
Francisco, & Santa Clara

\$682.5M

Medium
Counties

\$245.1M

Small Counties

\$134.1M

Competitive Program Threshold and Rating Criteria





Competitive Program: Threshold Requirements

- **Eligible Applicant:**
 - County as sole applicant if it is a development sponsor, or jointly with a separate entity as a development sponsor.
- **Development Team Capacity:**
 - Two affordable rental housing projects funded in the last 10 years, one must include 1 PSH unit for Homeless, Chronically Homeless, or those At-Risk of chronic homelessness.
 - 3 years experience of Lead Service Provider and Property Manager in serving NPLH Target Population.



Competitive Program: Threshold Requirements

- **Project must be integrated**
 - Projects of 20+ units, no more than 49% of the units will be restricted as NPLH units.
 - Projects of 20 or fewer units can restrict more than 49%, but Article 34 applies..
 - NPLH units integrated with other project units
 - Encourage social interaction
 - Community building activities
 - Architectural design
 - No special restrictions on guests



Competitive Program: Threshold Requirements

- **Project Financial Feasibility**
 - Uniform Multifamily Regulations
 - Tenant incomes cannot exceed 30% AMI
 - Rents restricted from 15%-30% AMI
 - Tenant pays no more than 30% of income in units with Capitalized Operating Subsidy Reserves or rent subsidy.



Competitive Program: Threshold Requirements

- **Eligible Housing Types**
 - Minimum 5 units
 - Can be single developments, scattered-site, or shared housing
 - Common ownership, financing, and property management
 - Each tenant signs a lease
 - Permanent foundation, meet State and local codes, minimum sq. footage requirements.



Competitive Program: Threshold Requirements

- **20-yr Supportive Services**
 - County commits to provide mental health services & coordinate provision/referral to other services, including but not limited to substance use treatment services.
 - County-Approved Supportive Services Plan
 - Minimum services offered (discussed later)



Competitive Program: Threshold Requirements

- **Low-Barrier Tenant Selection Practices**
 - Housing First Practices
 - Eligibility not limited to clients of County Mental Health Department, as long as the tenant has a qualifying diagnosis under MHSA.
 - Adults – Serious Mental Illness
 - Children/Adolescents – Serious Emotional Disturbance



Competitive Program: Threshold Requirements

- **County Homelessness Plan**
 - Local Continuum of Care Plan
 - MHSA Plan addressing homelessness
 - Other County Plan
 - Subject to public input, publically approved, easily accessible/available.
 - May use NPLH Technical Assistance funds to develop



Key Question:

1. Are these minimum thresholds achievable?



Competitive Program: Application Rating Factors

Proposed Application Process

- Two funding rounds per year
- 9% or 4% tax credits
- Rating factors will be designed to be 'self-scoring' where feasible
- Appeal process



Competitive Program: Application Rating Factors

- **Percentage of Units Restricted to Chronically Homeless and those At-Risk of Chronic Homelessness (Statutory)**
 - For projects 20+ units, the Department will establish a ceiling on available points based on restricting up to 49% of units.
 - Must discuss how use of Coordinated Entry System or other comparable needs-based prioritization system can be used to achieve proposed targets.



Competitive Program: Application Rating Factors

- **Capital Leverage (Statutory)**
 - Ratio of permanent enforceable financing commitments to the NPLH requested amount.
 - Land donations can count based on current appraised value.
 - May cap the percentage needed to score full points.



Competitive Program: Application Rating Factors

- **Operating/Rental Subsidy Leverage (Statutory)**
 - Scored on percentage of units with committed non-State subsidy
 - Section 8 (project or tenant-based)
 - Family Unification Program Vouchers
 - Shelter Plus Care
 - Other permanent project-based housing subsidies



Competitive Program: Application Rating Factors

- **Project Readiness (Statutory)**
 - Acceptable site control under Uniform Multifamily Regulations
 - Market Study meeting TCAC requirements
 - All required environmental clearances
 - Phase I with no Recognized Environmental Conditions or Phase II with remediation adequately budgeted
 - All required land use approvals except building permits and other ministerial approvals.



Competitive Program: Application Rating Factors

- **Supportive Services (Statutory)**
 - Number and type of services offered on-site based on county-approved supportive services plan (discussed later).
 - Transportation availability/accessibility to off-site services
 - Frequency of available services



Competitive Program: Application Rating Factors

- **Past History of Using Evidence-Based Practices to assist Chronic and At-Risk Homeless (Statutory) such as:**
 - Project Design & Safety Features
 - Critical Time Intervention models
 - Motivational interviewing
 - Trauma-informed Care
 - Cognitive Behavioral Therapy
 - Other SAMHSA-recognized evidence-based practices



Competitive Program: Application Rating Factors

- **Possible Other Rating Factors**
 - Streamlined local entitlement process
 - Joint application with a developer, collaboration between county Department of Mental Health and housing departments or use of a housing consultant to assist with development process.



Competitive Program: Application Rating Factors

- **Possible Other Rating Factors**
 - Use of Coordinated Entry System prioritizing chronically homeless, and others with the most barriers to housing stability.
 - Other demonstrated collaboration between local housing, behavioral health, and Continuum of Care.
 - Collaboration with health plans to encourage linkage of non-MHSA services dollars to NPLH units, as well as tracking of health outcomes.



Key Questions

1. What rating factors should be prioritized/assigned the most points?
2. What Best Practices should be prioritized in the rating process?
3. Should the Department provide more points to projects with staff to client ratio of 1:25 or lower?
4. What other factors should be evaluated or taken into consideration?

Capitalized Operating Subsidy Reserves (COSRs)





Capitalized Operating Subsidy Reserves (COSR)

Lessons learned from the MHSA Housing Program:

- Delays in tenant benefits (SSI/SSP; Section 8)
- Higher than expected unit turnover rates
- Higher than expected furnishings and fixtures replacement costs

Department is seeking to refine COSR sizing methodology to:

- Address operating shortfalls, and
- Size the COSR to meet 20 year viability period



Capitalized Operating Subsidy Reserves (COSR) Modeling

Rent-Based Cap:

Under this modeling, COSRs will be sized per county based on a typical AMI rent, (for example, 45 percent of the AMI), at different unit sizes, with an annual escalator for operating expenses, and a smaller annual escalator for tenant income.

Budget-Based Cap:

Under this modeling, the COSR sizing is based on an increase in the percentage of costs attributable to NPLH units, along with the assumptions for tenant income, rent subsidy, and inflation.



Ineligible Capitalized Operating Subsidy Reserves (COSR) Costs

- Allowable deferred developer fees, asset management fees or partnership management fees that can be paid for out of cash flow from the non-NPLH units or for which the payment of the NPLH pro-rata share of these fees would jeopardize the 20-year viability of the Capitalized Operating Subsidy Reserves.
- Deposits to contingent operating reserves beyond those required by the Department under the Uniform Multifamily Regulations or by other project financing sources.
- Vacancy loss beyond 3 months for a tenant who has left the unit.
- Supportive services costs not permitted as part of the project budget under the Uniform Multifamily Regulations.



Ineligible Capitalized Operating Subsidy Reserves (COSR) Costs

- Loan Payments (except payments for Department loans)
- Ground lease payments
- Sponsor distributions
- Costs associated with non-NPLH units



Anticipated Spring 2017

- **Department will release for Public Comment:**
 - Results of COSR modeling
 - Proposed COSR sizing
 - Proposed per unit subsidy and maximum loan limits
 - Proposed Program Guidelines

Supportive Services Plan and Requirements





Supportive Services Plan and Requirements

Services Required to be Made Available

- On-site case management
 - Mental health services
 - Substance use services
- Physical health care services
- Benefits counseling and advocacy
 - Life skills
- On-site peer support and advocacy
 - Transportation plan
- Recreational and social activities
 - Housing retention services
- Linkages to community resources
- Recreational and social activities

Services that may be made available

- Educational services
- Employment services
- Tenant advocacy programs
- Community-based services, partnerships and programs



Supportive Services Plan and Requirements

The county must submit a supportive service plan addressing the following:

- Description of NPLH Target Population to be served
- Tenant outreach plan, tenant engagement and retention strategies
- Detailed description of each services to be offered, service provider, frequency of service provided and location of services.
- Supportive service line item budget
- Reasonable Accommodation policy and procedure



Supportive Services Plan and Requirements

- Eviction prevention practices
- Communication policy and procedure for service provider and property manager.
- Narrative of how services are culturally and linguistically competent
- Physical design of project – how fosters tenant engagement, services provision, safety.



Supportive Services Plan and Requirements

Written Agreements:

- Copies of signed agreement between county, contracted service providers, project owner and project manager on roles and responsibilities consistent with the Supportive Services Plan.
- Copy of tenant selection plan and property management plan.

The Department may request updated documents prior to award of funds or loan closing.

Outcome Measures





Outcome Measures: Reporting Requirements

Pursuant to Welfare and Institution Code Section 5849.11, counties shall annually report the following information:

- Project location, services, and amenities
- Number of NPLH-assisted units, and total assisted and non-assisted units
- Project occupancy restrictions
- Number of individuals and households served



Outcome Measures: Reporting Requirements

- Income levels for NPLH tenants
- Homeless status (upon entry)
- Veteran status
- Current mental health status



Outcome Measures: Proposed Additional Measures

The Department must report to the Legislature annually regarding the processes established for distributing funds, counties disbursed to, and recommendations for program improvements. Proposed additional measures include:

- **Project / Tenant Characteristics:**
 - Demographic data for each tenants
 - Disability type
 - Length of time each tenant was homeless or institutionalized prior to being housed
 - Referral sources
 - Number of days from referral to move-in
 - Each tenant's length of residence measured in days
 - Information on which tenants have moved out of project, where each tenant moved to
 - Vacancy rate
 - Information on which tenants have moved into non-PSH affordable housing or private market housing



Outcome Measures: Proposed Additional Measures

- **Additional Proposed Measures:**

- Source(s) of income and annual increases in each tenant's income
- Information on which tenants have moved to lower or higher levels of care

To the extent county data is available:

- **Utilization:**

- Emergency room visits before and after housing for each tenant
- Average number of hospital and psychiatric facility admission (including inpatient days) before and after move-in
- Number of arrests and returns to jail or prison before and after move-in
- Reduction in public benefit payments resulting from employment



Outcome Measures: Proposed Additional Measures

- **Impact on MHSA:**
 - Use of MHSA funds for services
 - Amount of MHSA funds contributed per project for services
 - Impact on supportive services and bond interest cost on MHSA reserves



Key Questions

1. Are there any other outcome measures the Department should consider using?
2. Of the measures proposed, are there any that the Department should remove from consideration?
3. What are the challenges with data collection that the Department should be aware of in designing this part of the program?

Alternative Program





Alternative Program: Los Angeles, San Diego, San Francisco, and Santa Clara

For Alternative Program counties to administer their own funds they must:

- Have a minimum of 5% of the State's homeless population as measured through HUD Point In Time Count data.
- Demonstrate the capacity to directly administer loan funds for permanent supportive housing serving the Target Population.
- Have the ability to prioritize those with mental health needs who fit the Target Population criteria consistent with program requirements.

Counties participating in the Alternative Program shall not be eligible for funds available through the Competitive Program funding pool.



Alternative Program: Criteria for Qualification

Through a solicitation of interest process conducted by HCD prior to the first NOFA, each county's capacity to administer will be evaluated based on the following:

Capacity:

- 1. Demonstrated ability to finance permanent supportive housing developments with local and federal funds and the ability to monitor rental project loans.**
 - 1 affordable housing program within the past 5 years that funded a minimum of 2 multi-family rental project loans per year (including at least one loan per year for permanent supportive housing).
 - Narrative of current project selection process and requirements, underwriting standards, financial management systems, and long-term monitoring systems for the above program(s).
 - Proposed NPLH Method of Distribution addressing capacity of the service provider and property manager, as well as project financial feasibility and readiness.



Alternative Program: Criteria for Qualification

- 2. Past performance in delivering supportive services to the NPLH Target Population in housing:**
 - Provide a list of projects where it is currently providing or coordinating the provision of supportive services to the Target Population.
- 3. Past history of committing project-based vouchers to supportive housing:**
 - Provide a list of projects with the number of units where the county Public Housing Authorities have committed project-based vouchers within the last two years to NPLH Target Population.



Alternative Program: Criteria for Qualification

4. Ability to prioritize the most vulnerable within the NPLH Target Population through Coordinated Entry System:

- Must have a Coordinated Entry System that is operating by the time the Department certifies the county to participate.
- Must prioritize the most vulnerable within the NPLH Target Populations by utilizing the Coordinated Entry System or another similar system if your Coordinated Entry System cannot refer those At-Risk of Chronic Homelessness who are not currently homeless (because they are still institutionalized, for example).

Project Selection Process

5. Demonstration that NPLH project selection process will ensure projects meet the statutory requirements as set forth in the Department's Program Guidelines, including but not limited to:

- Integration requirements:
 - a. NPLH units must be integrated into project and not be separated from other tenant populations.



Alternative Program: Criteria for Qualification

- Funded projects must encourage social interactions through community building activities and architectural design, and do not impose restrictions beyond typical limitations in unsubsidized housing.
- In projects of more than 20 units, an Alternative Program county may choose to fund/restrict no more than 49% of a project's total units.

OR

- If county chooses not to impose this restriction, the county must document for the Department the specific measures it will take to ensure that the requirements of the Olmstead Decision and accessibility, fair housing, and antidiscrimination requirements can be met.



Alternative Program: Criteria for Qualification

6. Low Barrier Tenant Selection

- Prioritize vulnerable populations and offer flexible, voluntary, and individualized supportive services for 20 years.

7. Eligible Uses of Funds

- Funds shall be offered to finance eligible NPLH capital costs including capitalized operating reserves.

8. Financial Feasibility

- Requirements/underwriting standards that enable projects to remain affordable to NPLH tenants for a minimum of 55 years.
- Alternative Program counties are responsible for project selection, underwriting, and long-term monitoring. They can use the Department's project selection criteria and Uniform Multifamily Regulations, but are not required to.



Alternative Program: Criteria for Qualification

9. Reporting and Program Evaluation

Each county must certify compliance with all of the Department's reporting and program evaluation requirements, including:

- Providing an annual schedule of proposed NPLH Notice of Funding Availability/Request for Proposal releases, amounts made available, and awards made.
- Quarterly Expenditure Reports
- Data on required program outcome measures
- Other information as may be required by the Legislature or other State oversight agency.



Alternative Program: Other Information

Department Monitoring Responsibilities: The Department may conduct annual monitoring to:

- Ensure processes are in place
- Funds are being drawn down for eligible expenses
- Ensure statutory and State requirements are being met

Unused funds:

Funds not committed within 2 years of award by the Department will be redirected to the Competitive Program. (Annual allocations based on anticipated demand for the funds).



Key Question

1. If an Alternative Program county cannot meet these requirements should the Department allow the county to contract with one or more cities or housing authorities that can meet the requirements on their own to administer the county's NPLH allocation?

**Submit Public Comments on
Draft Framework by
January 31, 2016
to
NPLH@hcd.ca.gov**



California Department of Housing and Community Development
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Sacramento, CA. 95833